

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

<b>NICHOLAS J. BENEDETTI, individually</b>	:	
<b>and on behalf of all others similarly</b>	:	<b>Case No. 1:10-cv-00660</b>
<b>situated,</b>	:	
<b>Plaintiff,</b>	:	
<b>v.</b>	:	
<b>KEY CORP and KEY BANK NATIONAL</b>	:	
<b>ASSOCIATION d/b/a KEYBANK,</b>	:	
<b>Defendants.</b>	:	

**MOTION FOR ADMISSION *PRO HAC VICE*  
OF ATTORNEY JOSEPH G. GUGLIELMO**

Plaintiffs respectfully move the Court for admission *pro hac vice* of attorney Joseph P. Guglielmo, Scott+Scott LLP, 500 5th Avenue, 40th Floor, New York, New York, 10019. Attorney Guglielmo is an experienced litigator who has particular knowledge of and familiarity with the issues involved in this case. Accordingly, Attorney Guglielmo would greatly assist Plaintiffs' prosecution of this case. The undersigned will continue to serve as counsel for the Plaintiffs and will ensure that Attorney Guglielmo is familiar with the local rules and practices of this Court.

In support of his motion for admission, attached hereto as Exhibit 1 is the Affidavit of Joseph P. Guglielmo showing that Mr. Guglielmo is a member of the law firm of Scott+Scott LLP, that he is a member in good standing of the Bars of the State of New York, the State of Connecticut and the Commonwealth of Massachusetts.

For the above reasons, Plaintiffs respectfully request this Court grant Plaintiffs' Motion for Admission *Pro Hac Vice* of Attorney Joseph P. Guglielmo.

Dated: April 8, 2010

Respectfully submitted,



Geoffrey M. Johnson (0073084)

SCOTT+SCOTT LLP  
12434 Cedar Road, Suite 12  
Cleveland Heights, OH 44106  
Telephone: (216) 229-6088  
Facsimile: (216) 229-6092  
Email: [gjohnson@scott-scott.com](mailto:gjohnson@scott-scott.com)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify on the 8 day of April, 2010, a copy of the foregoing Motion for Admission *Pro Hac Vice* of Attorney Joseph P. Guglielmo was served via the electronic filing system, and to those not registered on the electronic filing system, a copy was mailed via U.S. Mail, postage prepaid.



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Cleveland Heights, OH 44106  
Telephone: (216) 229-6088  
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*Attorneys for Plaintiffs*

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**and on behalf of all others similarly** : **Case No.**  
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**Plaintiff,** :  
**v.** :  
**KEY CORP and KEY BANK NATIONAL** :  
**ASSOCIATION d/b/a KEYBANK,** :  
**Defendants.** :

**AFFIDAVIT OF JOSEPH P. GUGLIELMO IN SUPPORT OF MOTION  
FOR ADMISSION OF COUNSEL *PRO HAC VICE***

I, Joseph P. Guglielmo, being duly sworn upon oath, depose and say:

1. I am an attorney for Plaintiffs in the above-referenced case. I make this Affidavit in support of a Motion for Admission of Counsel *pro hac vice* in this case.
2. I am a member in good standing of the bars of the following courts and jurisdictions: the State of New York, the State of Connecticut and the Commonwealth of Massachusetts.
3. I am an attorney at New York City, New York firm location of Scott+Scott:

Joseph P. Guglielmo  
(New York Reg. #759819)  
Scott+Scott LLP  
500 5th Avenue, 40th Floor  
New York, New York 10019  
Telephone: 212-223-6444  
Facsimile: 212-223-6334  
Email: [jguglielmo@scott-scott.com](mailto:jguglielmo@scott-scott.com).

4. I regularly represent individuals and classes of individuals in similar litigation in other federal courts. I am the attorney sought by Plaintiffs in this case and good cause exists for this Court to admit *me pro hac vice*.

5. I acknowledge and agree that if I am admitted to *pro hac vice*, I will submit to the rules of this Court.

6. I have never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States, or have ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.

FURTHER AFFIANT SAYETH NAUGHT.

Joseph P. Guglielmo (New York Reg. 759819)

New York  
State of Ohio )  
New York )  
County of Cuyahoga )

Subscribed and sworn to (or affirmed) before me on this 6<sup>th</sup> day of April, 2010, by Joseph PL. Guglielmo, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Ann E. Slaughter  
Notary Public

Place Seal:

ANN E. SLAUGHTER  
Notary Public-State of New York  
No. 01SL6183108  
Qualified in Bronx County  
Commission Expires March 10, 2012